

Filed

9-7-11

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

Clerk, U. S. District Court  
Western District of Texas

By

SB

Deputy

UNITED STATES OF AMERICA

§

§

v.

§

No. 1:11-CR-360-SS

§

CRYSTAL MORIN (9)

§

**FACTUAL BASIS**

**INFORMATION:** 21 U.S.C. § 841(a)(1), Possession with Intent to Distribute a Mixture and Substance Containing a Detectable Amount of Heroin.

**ELEMENTS OF  
THE OFFENSE:**

In order to establish the crime of Possession with Intent to Distribute a Mixture and Substance Containing a Detectable Amount of Heroin, in violation of 21 U.S.C. § 841(a)(1), as set out in the information, the Government must prove the following elements beyond a reasonable doubt:

- First: That the defendant knowingly possessed a controlled substance;
- Second: That the controlled substance was a mixture and substance containing a detectable amount of heroin; and
- Third: That the defendant possessed the heroin with the intent to distribute it.

**STIPULATED FACTS:**

On June 22, 2011, Crystal Morin, acting under the direction of Michael Morin, delivered one ounce of heroin to Chris Davila in Austin, Texas. Pursuant to a recorded telephone conversation with Michael Morin and Davila, Michael Morin told Davila that Crystal Morin would deliver one ounce of heroin to Davila at Davila's residence. He also

said that he would pass Davila's phone number to Crystal so they could communicate with each other. When Davila expressed concern over this arrangement, Michael Morin told him that Crystal was "cool" and had "done this before."

Crystal Morin admits that she knowingly possessed with intent to distribute a mixture and substance containing a detectable amount of heroin as described in the information.

SIGNED on this 7<sup>th</sup> day of September, 2011.

Crystal Morin  
CRYSTAL MORIN  
Defendant

Christie Williams  
CHRISTIE WILLIAMS  
Attorney for Defendant

Daniel D. Guess  
DANIEL D. GUESS  
Assistant United States Attorney